

Air Quality Reviews

Los Alamos National Laboratory

Laboratory Implementation Requirements LIR404-10-01.1

Issue Date: April 30, 1998 Revision Date: October 2, 1998

Mandatory Document

1.0 Introduction

1.1 Overview

Integrated safety management (ISM) requires that managers and supervisors identify and mitigate hazards associated with new activities and projects at the Laboratory and that work be authorized before the new activities begin. A necessary element of the identification of hazards is the assessment of whether the activity or project requires regulatory permitting, work practice standards implementation, or emissions monitoring as required by federal and state air quality regulations. This document describes the required review of proposed activities and projects for these air quality requirements.

Unless otherwise stated in the text, the contents of this document are effective upon the issue date.

See Attachment 8 (Guidance) for Recommended Major Implementation Criteria for Self-Assessment.

1.2 In this Document

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2.0 Purpose

These requirements are established in support of LPR404-10-00, "Performance Requirements for Air Quality," for the review of all new Laboratory activities and projects to ensure air quality regulatory requirements are met before the activity or project begins.

3.0 Scope and Applicability

As part of ISM, all new activities at the Laboratory shall undergo an assessment of hazards before the activity or project is initiated. This review is required by Safe Work Practices (LIR300-00-01) and Hazard Analysis and Control for Facility Work (LIR402-

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10-01). This document describes the portion of the assessment process as it applies to air quality regulatory requirements.

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4.0 Definitions

air quality review—The review of new activities and projects at the Laboratory for the purpose of identifying air quality regulatory requirements.

permit—A written permission from a regulatory agency (for example., the Environmental Protection Agency or the New Mexico Environment Department) required as authorization to operate, construct, or modify a source of air emissions. This may take the form of a formal permit, a pre-construction application, etc.

5.0 Responsibilities

The responsibilities for implementing the air quality review requirements are as follows:

Who	Shall
5.1 Line Managers/ Supervisors	Ensure that a review of air quality requirements, as described in this document, is integrated into the ISM hazard control system (LIR300-00-01, “Safe Work Practices” and/or LIR230-03-01, “Facility Management Work Control”).
5.2 ESH-17	ESH-17 shall maintain Clean Air Act compliance expertise for the Laboratory including a detailed knowledge of existing laws and regulations and how they apply to the Laboratory. They shall assist line managers and supervisors in identifying and addressing air quality issues. ESH-17 is the Laboratory’s single point of contact to regulators on Clean Air Act issues.

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6.0 Requirements

6.1 Air Quality Review

An air quality review shall be an integral element of the ISM hazard screening process for all new activities or projects and shall be a part of the process by which work is authorized.. The questions found below will assist in determining if any air quality regulatory requirements exist for an activity or project. The associated attachments can be used to clarify or further help identify potential air quality regulatory issues. If regulatory issues *do* exist, ESH-17 must be contacted for an air quality requirements determination and to assist you in the preparation of permits, the implementation of work practice standards, and the installation of emission monitoring equipment, as applicable. If air quality regulatory issues *do not* exist, the new activity or project may proceed without further air quality review.

An air quality regulatory issue may exist if the activity involves:

- the installation or modification of boilers, generators, or other stationary combustion equipment. (Attachment 1)
- the use of radionuclides. (Attachment 2)
- the maintenance (for example, filter changes), installation, or modification of building exhaust system components. (Attachment 3)
- the use of beryllium. (Attachment 4)
- the removal or disposal of asbestos or asbestos containing material.
- the installation of a new storage tank or a change in the liquid stored in an existing storage tank. (Attachment 5)
- halogenated solvent cleaning. (Attachment 6)
- the melting of more than one ton of lead annually.
- the excavation or disturbance of soils potentially contaminated with radionuclides or chemicals. (Attachment 7)
- any demolition or decommissioning of a facility or structure.

Special Note on Chemical Usage: If an activity uses chemicals, ensure these chemicals are being tracked by the Automated Chemical Inventory System (ACIS). Although chemical management is not a requirement of this document, assuring that accurate tracking of all chemicals used in activities or processes on the ACIS system provides necessary information required for reporting under the Clean Air Act, the Emergency Planning and Community Right-to-Know Act (specifically, Subparts 311, 312, and 313 of the Superfund Amendments and Reauthorization Act).

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7.0 Documentation

7.1 Air Quality Review Records

ESH-17 shall maintain records of all new activities and projects that have been referred to EHS-17 for a regulatory applicability determination. All records, including any referenced documents, shall be maintained for a minimum of five years.

8.0 References

8.1 Document Ownership

The OIC for this document is ESH-17, the Air Quality Group (5-8855).

8.2 Documents

LIR300-00-01, "Safe Work Practices"

LIR230-03-01, "Facility Management Work Control"

LPR404-10-00, "Performance Requirements for Air Quality"

9.0 Attachments

Attachment 1: Boilers, Generators, and Other Combustion Equipment

Attachment 2: Radionuclides

Attachment 3: Exhaust System Components

Attachment 4: Beryllium

Attachment 5: Storage Tanks

Attachment 6: Solvent Cleaning Operations

Attachment 7: Contaminated Soils

Attachment 8: Recommended Major Implementation Criteria for Self-Assessment

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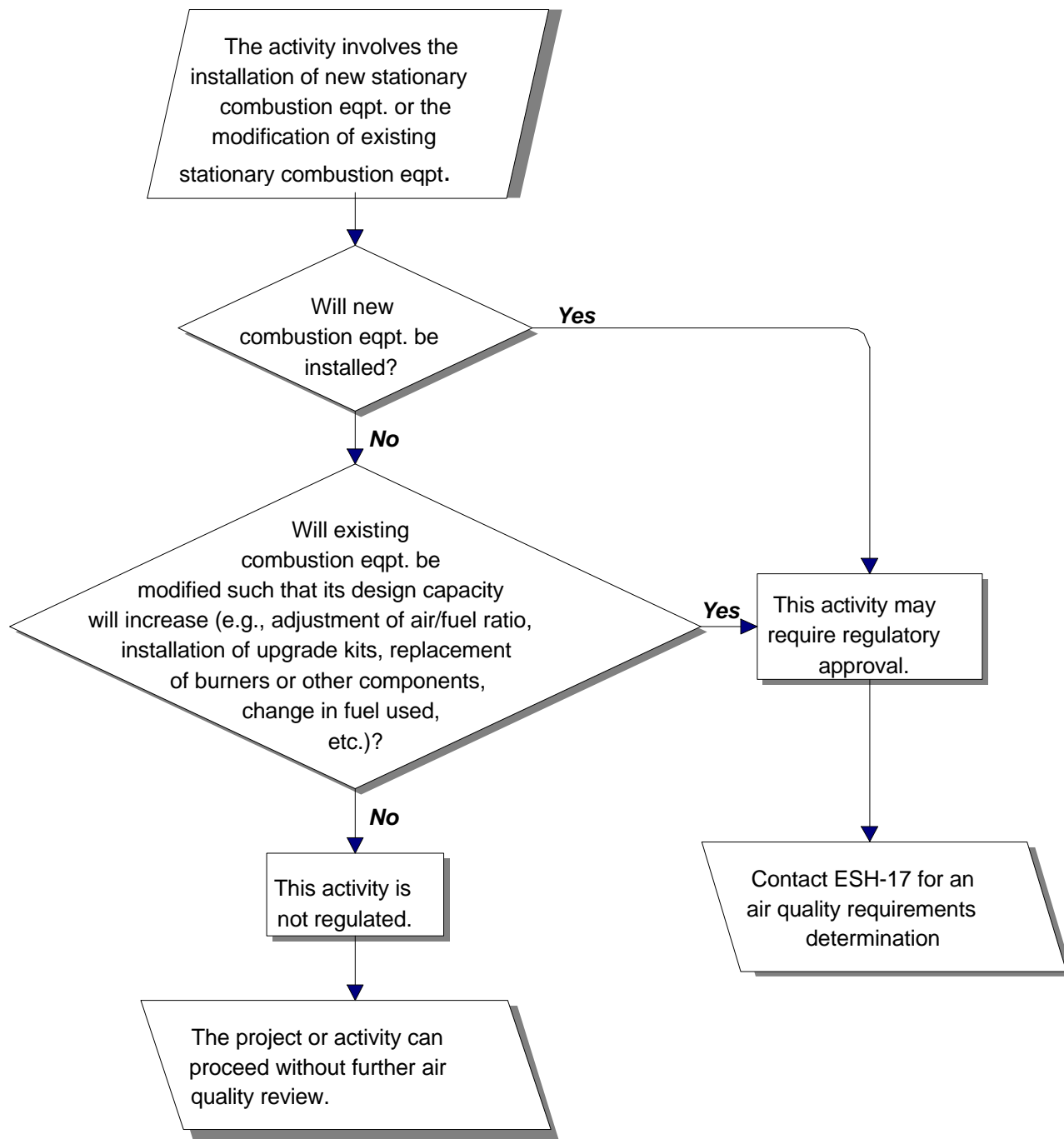
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Attachment 1

Boilers, Generators, and Other Combustion Equipment



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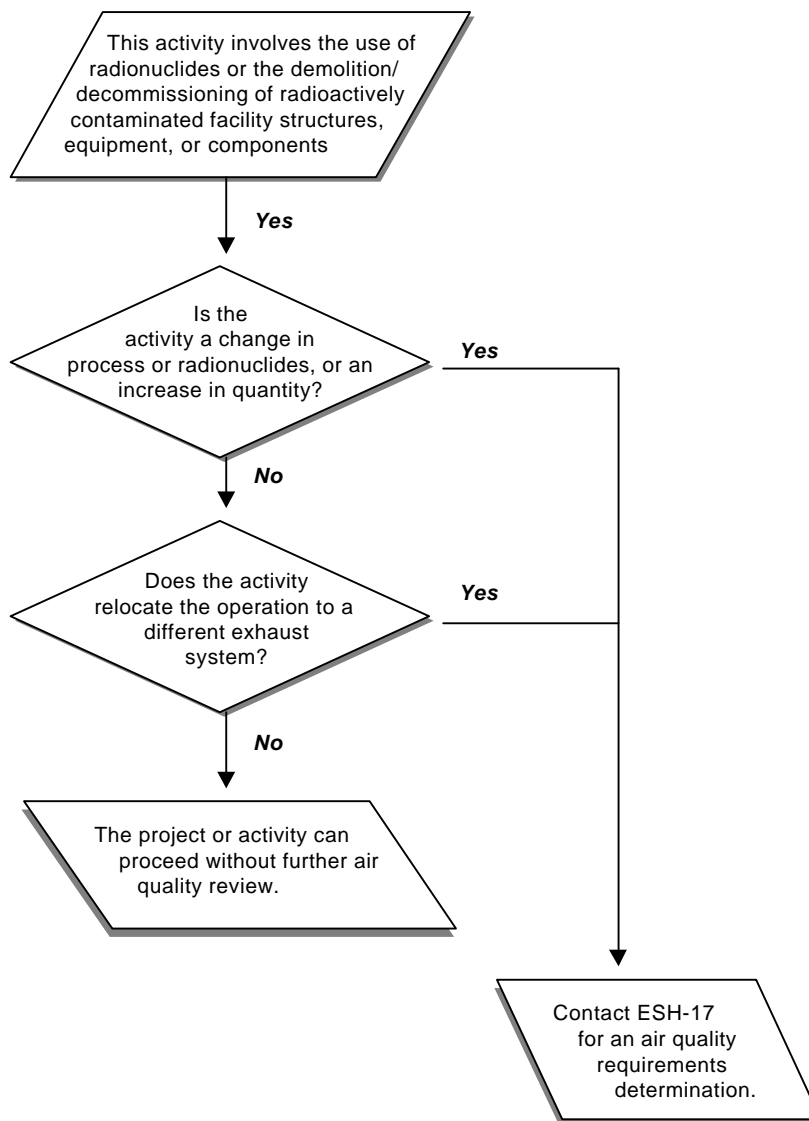
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Attachment 2

Radionuclides



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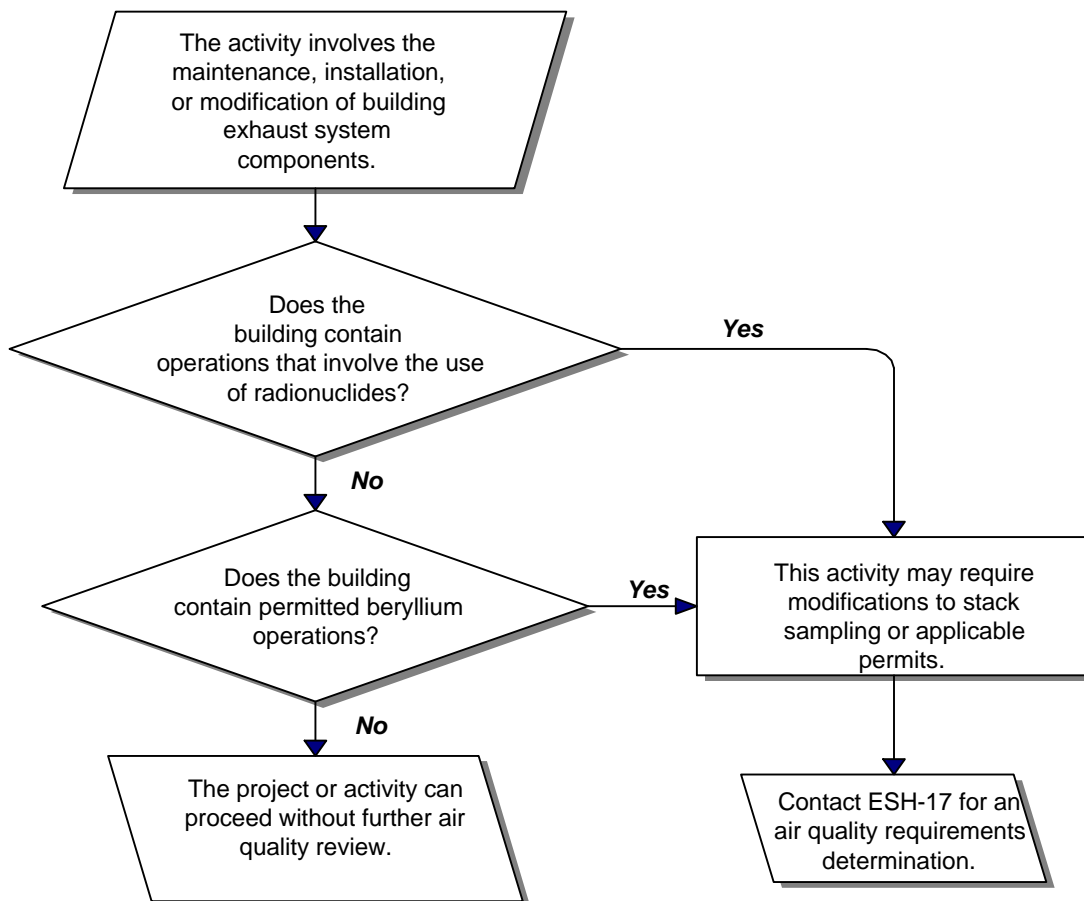
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Attachment 3

Exhaust System Components



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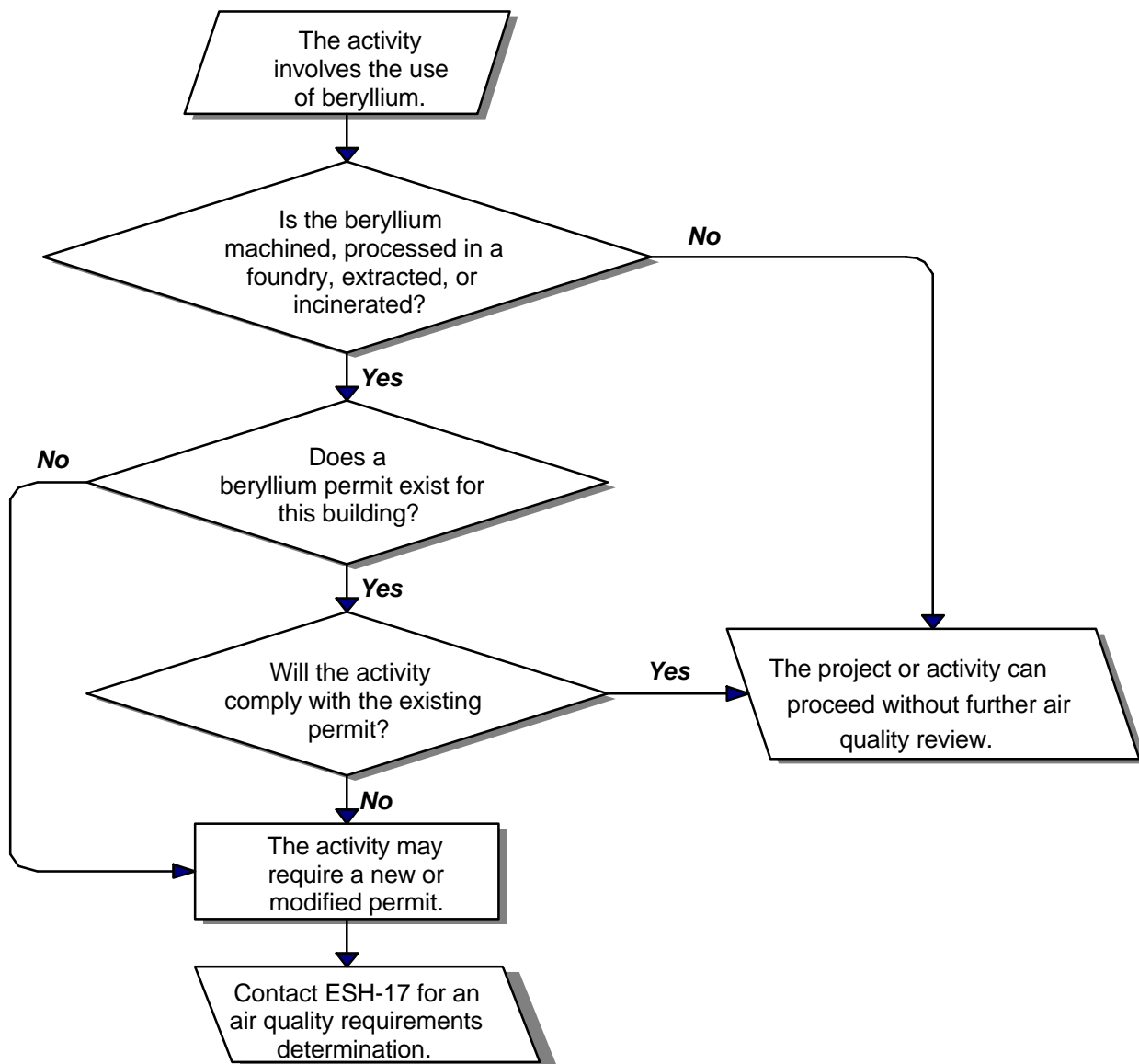
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Attachment 4

Beryllium



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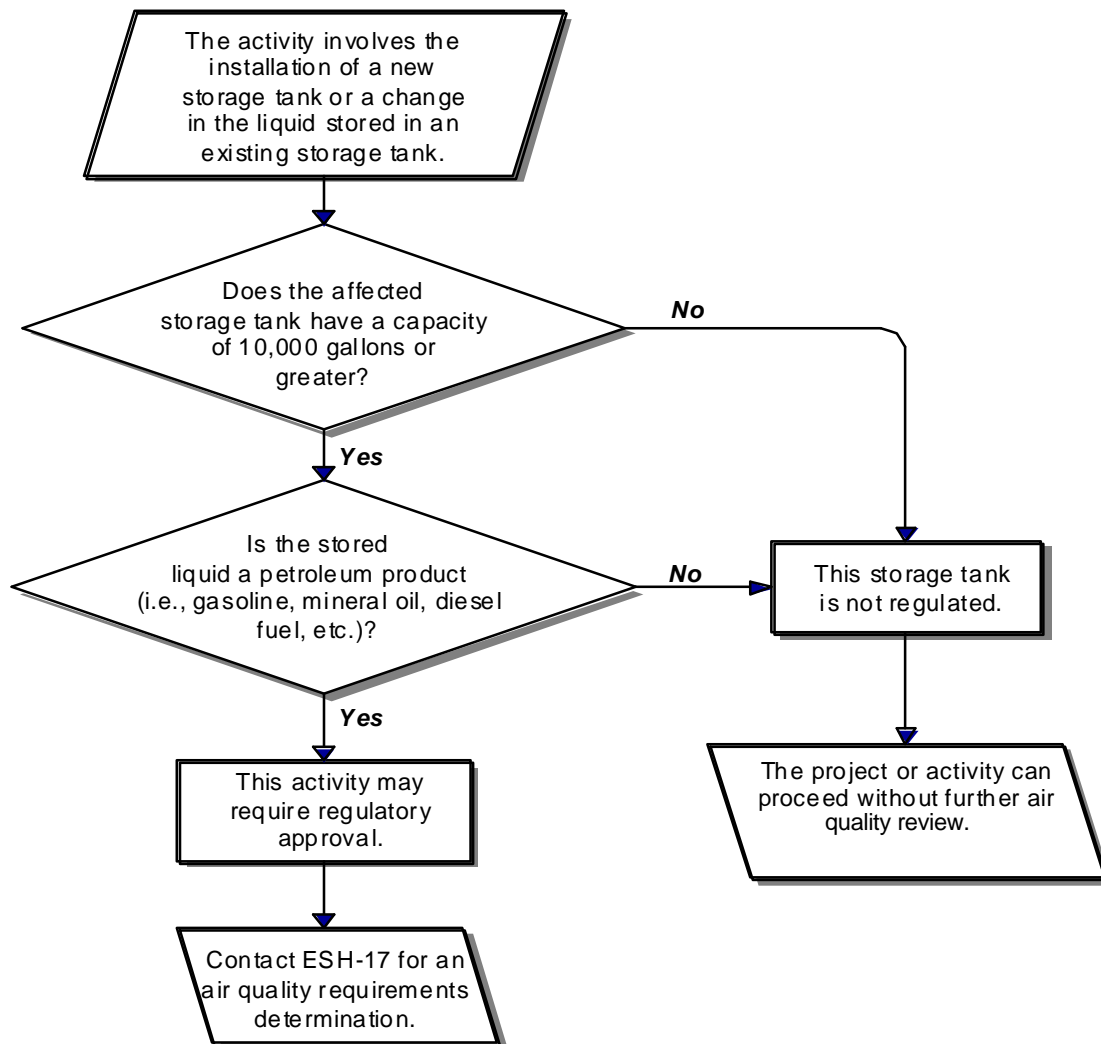
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Attachment 5

Storage Tanks



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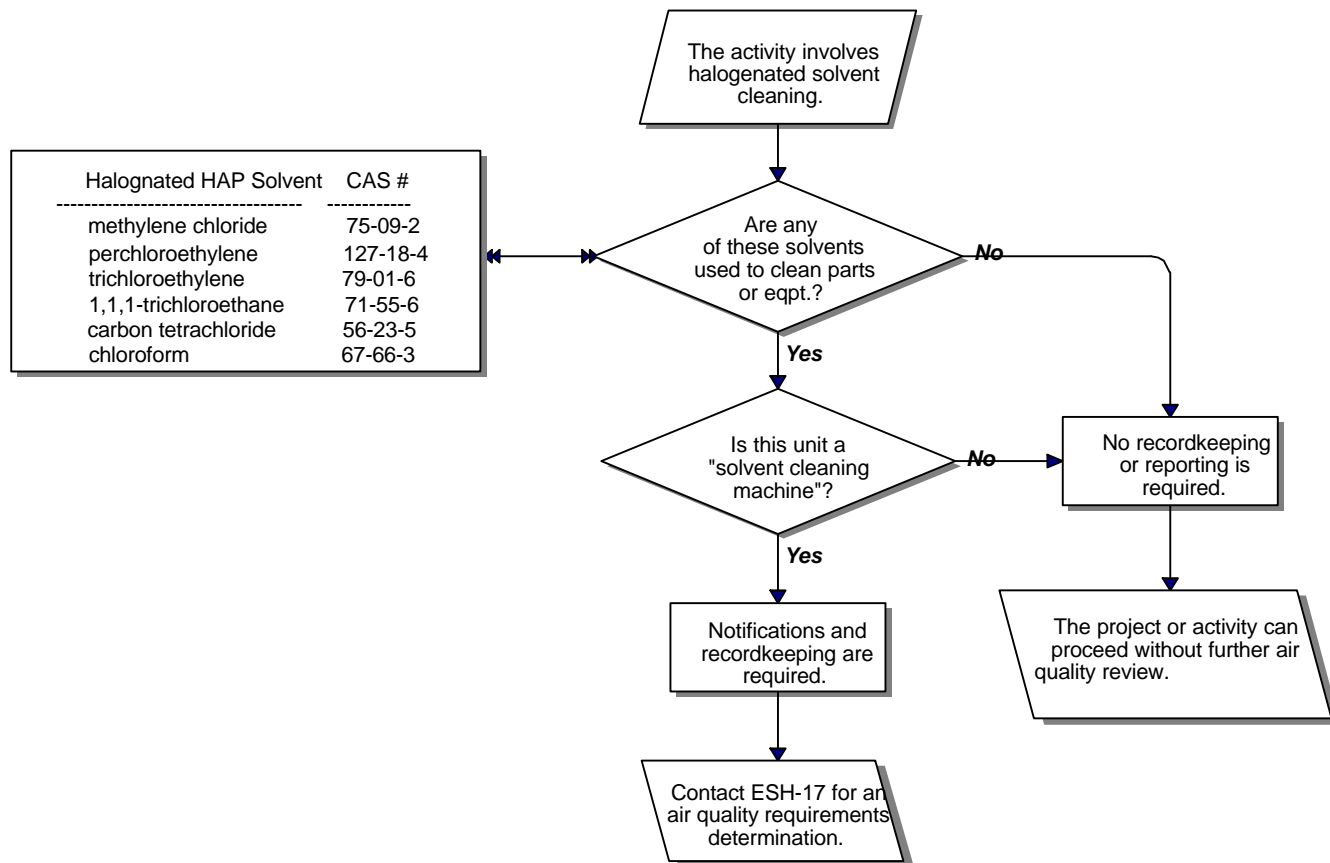
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Attachment 6

Solvent Cleaning Operations



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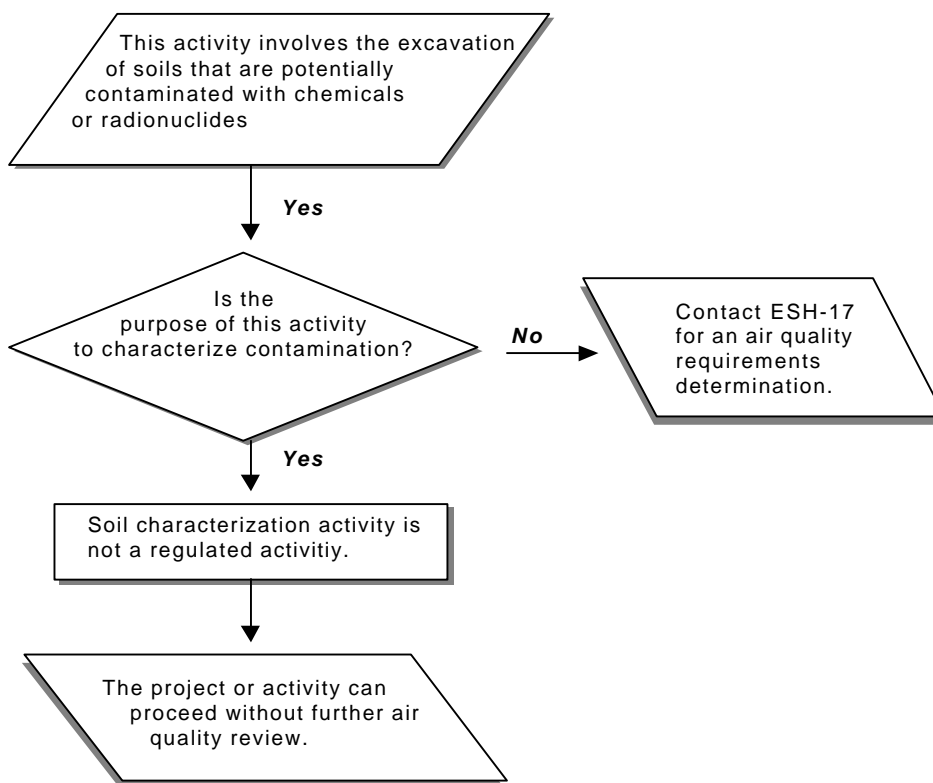
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Attachment 7

Contaminated Soils



Guidance

Attachment 8

Recommended Major Implementation Criteria for Self-Assessment

(Non-Mandatory)

LIR Title	LIR Number
Air Quality Reviews	LIR 404-10-01.1

The major implementation criteria listed below are provided to assist Laboratory organizations assess their implementation of this LIR. These criteria provide an objective basis for self-assessing implementation of the major requirements contained in the LIR. The LIR also states requirements in other areas, such as, scope, precautions, and responsibilities that, when applied, complement the successful implementation of these major requirements.

- 1. The most important criterion for assessing the implementation status of this LIR should be, if applicable: Have the requirements contained in the LIR been communicated to the individual(s) responsible for performing the work?**
- 2. In addition, the recommended major implementation criteria for self-assessment of this LIR are the following:**
 - Line Managers/Supervisors must integrate air quality review requirements into the ISM (Integrated Safety Management) hazard control system for all new activities and projects (see section 5.1),
 - Potential Air Quality regulatory requirements must be reviewed for all new activities and projects using the bulleted screening list in section 6.1 and Attachments 1-9 of the LIR,
 - When a potential air quality issue is identified, contact ESH-17 for a comprehensive requirements determination of the new activity or project (the comprehensive review for a new activity or project will be done by ESH-17 when requested directly or referred through the ESH-ID process) (see section 6.1).